

## The Honorable Robert J. Bryan

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT TACOMA**

## STATE OF WASHINGTON,

CIVIL ACTION NO. 17-cv-05806-RJB

Plaintiff,

DECLARATION OF MARSHA CHIEN  
IN SUPPORT OF STATE OF  
WASHINGTON'S MOTION FOR  
CLARIFICATION

THE GEO GROUP, INC.,

**Defendant.**

1 Pursuant to 28 U.S.C. § 1746(2), I, Marsha Chien, state and declare as follows:

2 1. I am over eighteen years of age, have personal knowledge of and competent to  
3 testify about the matters contained herein. I am an Assistant Attorney General for the Attorney  
4 General of Washington and one of the attorneys representing the State of Washington in this  
5 matter.

6 2. GEO identified six different state agency witnesses: Tammy Fellin (L&I), Lynn  
7 Buchanan (L&I), Joshua Grice (L&I), Taylor Wonhoff (Governor's Office), and Colleen  
8 Melody (Attorney General's Office) in its proposed pretrial order and, on September 29, 2021,  
9 served the State of Washington with trial subpoenas for five of the agency witnesses. (Mr.  
10 Johnson is retired, so any trial subpoena would have been directly sent to his private residence).

11 3. Attached hereto as Exhibit A are true and correct copies of Defendant's trial  
12 exhibits A-139, A-305, A-322–A-326, A-332–A-334.

13 4. Attached hereto as Exhibit B is a true and correct copy of excerpts of the April 13,  
14 2020 motion in limine hearing transcript.

15 I declare, under the penalty of perjury under the laws of the United States and the State  
16 of Washington, that the foregoing is true and correct.

17 Dated this 4th day of October 2021 in Seattle, Washington.

18  
19 s/ Marsha Chien  
20 MARSHA CHIEN, WSBA No. 22027  
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1                           **CERTIFICATE OF SERVICE**

2                           I hereby certify that the foregoing document was electronically filed with the United  
3 States District Court using the CM/ECF system. I certify that all participants in the case are  
4 registered CM/ECF users and that service will be accomplished by the CM/ECF system.

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6                           Dated this 4th day of October 2021 in Seattle, Washington.

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8                           CAITILIN HALL  
9                           Legal Assistant

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